BEFORE THE ENVIRONMENT COURT ENV-2021-CHC-052

IN THE MATTER	of the Resource Management Act 1991 (the Act)
AND IN THE MATTER	of an appeal pursuant to Clause 14 of the First Schedule of the Act
BETWEEN	Queenstown Park Limited and Remarkables Park Limited
	Appellant
AND	Queenstown Lakes District Council Respondent

## NOTICE OF SCOPE RESOURCES LTD WISH TO BE PARTY TO PROCEEDINGS

Date: 16 June 2021

Clark Fortune McDonald & Associates PO Box 553 Queenstown 9348 Email: <u>ngeddes@cfma.co.nz</u> Phone: 03 441 6071



## TO: The Registrar Environment Court CHRISTCHURCH

- Scope Resources Ltd (SRL) wish to be party to the following appeal against the Respondent's decisions (Decisions) on Proposed Queenstown Lakes District Plan – Stage 3:
  - a. An appeal by Queenstown Park Limited and Remarkables Park Limited vs Queenstown Lakes District Council (ENV-2021-CHC-052) (**Appeal**).
- 2. SRL made a submission (#3182) about the subject matter of the Appeal.
- SRL are not trade competitors for the purposes of section 308C or 308CA of the Resource Management Act 1991 (Act).
- 4. SRL are interested in the whole of the Appeal.
- 5. SRL are interested in the following particular issues:
  - a. The decision is not supported by adequate evidential or analytical basis in identifying the boundaries of Wahi Tupuna Kawarau #36;
  - b. The decision is not supported by a balanced analysis of identified threats within Wahi Tupuna Kawarau #36;
  - c. The decision does not correctly consider the practical effect of restrictions on landowners.
- 6. SRL **support** the relief sought by the Appellant because *inter alia*:
  - a. The identified boundary of Wahi Tupuna Kawarau #36:
    - i. fails to achieve the integrated management required by section 31 of the Act;
    - ii. is not the most appropriate way of achieving the purpose of the Act as required by section 32 of the Act;
    - iii. fails to promote the Act's sustainable management purpose.
- 7. SRL agrees to participate in mediation or other alternative dispute resolution of the Appeal.

Dated: 16<sup>th</sup> June 2021

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Nick Geddes for Scope Resources Ltd